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10 *Representing the United States of America*

11
12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 **UNITED STATES OF AMERICA,**

14 **Plaintiff,**

15 **vs.**

16 **ARLETTE ALEXIA MORENO,**

17 **Defendant.**

18
19 **CASE NO: 2:21-CR-00311-JAD-VCF**

20
21 **STIPULATION TO CONTINUE**
SENTENCING HEARING

22
23 It is hereby stipulated and agreed, by and between JASON M. FRIERSON, United
States Attorney, through PATRICK BURNS and SARAH A. KIEWLICZ, Trial Attorneys,
Department of Justice – Tax Division, and GABE GRASSO, ESQ., counsel for Defendant
ARLETTE ALEXIA MORENO, that the sentencing date in the above-captioned matter,
previously scheduled for May, 31, 2021, at 3:00 p.m., be vacated and continued until a time
convenient to the Court, but no sooner than September 2022.

24 This Stipulation is entered into for the following reasons:

1. On February 22, 2022, Defendant Arlette Alexia Moreno (Moreno) pleaded guilty to an information charging her with one count of Aiding and Assisting in the Preparation and Filing of a False Tax Return (26 U.S.C. § 7206(2)).

2. The Court set Moreno's sentencing hearing for May 31, 2022 at 3:00 p.m.

3. Counsel for Moreno requires additional time to investigate and prepare for sentencing.

4. The government requires additional time to collect factual information that may impact its position at sentencing.

5. To avoid the parties having to submit several requests to continue the hearing in the future, the parties are requesting that the hearing be continued to a setting no sooner than September 2022. The parties do not anticipate being able through reasonable diligence to prepare their sentencing positions before that date. Moreover, Moreno's counsel will be out of the jurisdiction during substantial parts of the first half of August 2022.

6. Defendant Moreno is out of custody on this case and does not oppose this request.

7. Denial of this request could result in a miscarriage of justice, taking into account the exercise of due diligence.

8. This is the first request for a continuance filed in this matter.

Dated this 12th day of May, 2022

JASON M. FRIERSON
United States Attorney

By: _____
GABE GRASSO, ESQ.
Counsel for Defendant MOPENO

By: _____
PATRICK BURNS
SARAH KIEWLICZ
Trial Attorneys – Tax Division

United States Department of Justice

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ARLETTE ALEXIA MORENO,
Defendant

CASE NO: 2:21-CR-00311-JAD-VCF

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On February 22, 2022, Defendant Arlette Alexia Moreno (Moreno) pleaded guilty to an information charging her with one count of Aiding and Assisting in the Preparation and Filing of a False Tax Return (26 U.S.C. § 7206(2)).

2. The Court set Moreno's sentencing hearing for May 31, 2022 at 3:00 p.m.

3. Counsel for Moreno requires additional time to investigate and prepare for sentencing.

4. The government requires additional time to collect factual information that may impact its position at sentencing.

5. To avoid the parties having to submit several requests to continue the hearing in the future, the parties are requesting that the hearing be continued to a setting no sooner than September 2022. The parties do not anticipate being able through reasonable diligence to prepare their sentencing positions before that date. Moreover, Moreno's counsel will be out of the jurisdiction during substantial parts of the first half of August 2022.

6. Defendant Moreno is out of custody on this case and does not oppose this request.

7. Denial of this request could result in a miscarriage of justice, taking into account the exercise of due diligence.

8. This is the first request for a continuance filed in this matter.

For all of the above-stated reasons, the ends of justice would be served best by a continuance of the sentencing date.

ORDER

IT IS ORDERED that the sentencing hearing in *United States v. Arlette Alexia Moreno*, Case No. 2:21-CR-00311-JAD-VCF, previously scheduled for May 31, 2022 at 3:00 p.m. is vacated and continued until October 4, 2022, at 11:00 a.m.

Dated this 12th day of May, 2022

By: Jennifer A. Dorsey
HON. JENNIFER A. DORSEY
U.S. DISTRICT COURT JUDGE